

TIMOTHY J. RACICOT
Assistant U.S. Attorney
U.S. Attorney's Office
P.O. Box 8329
Missoula, MT 59807
101 E. Front Street, Suite 401
Missoula, MT 59802
Phone: (406) 542-8851
Fax: (406) 542-1476
E-mail: Tim.Racicot2@usdoj.gov

FILED

JUN 01 2022

Clerk, U.S. District Court
District Of Montana
Great Falls

**ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**JACOB ISRAEL STRONG, aka
Jacob Israel Guill, and
CANDACE KATHLEEN BRIGHT,**

Defendants.

CR 22- 28 -M- DLC

INDICTMENT

**CONSPIRACY TO COMMIT
INTERNATIONAL PARENTAL
KIDNAPPING (Count 1)**
Title 18 U.S.C. § 371
(Penalty: Five years of imprisonment,
\$250,000 fine, and three years of supervised
release)

**INTERNATIONAL PARENTAL
KIDNAPPING (Count 2)**
Title 18 U.S.C. § 1204
(Penalty: Three years of imprisonment,
\$250,000 fine, and one year of supervised
release)

FALSE STATEMENTS (Counts 3-7)
Title 18 U.S.C. § 1001(a)(2)
(Penalty: Five years of imprisonment,
\$250,000 fine, and three years of supervised
release)

THE GRAND JURY CHARGES:

COUNT 1

That beginning on or about August 19, 2021, and continuing until on or about May 5, 2022, in Sanders County, in the State and District of Montana, and elsewhere, including Washington, Idaho, Texas and Costa Rica, the defendants, JACOB ISRAEL STRONG, *aka Jacob Israel Guill*, and CANDACE KATHLEEN BRIGHT, knowingly combined, conspired, confederated and agreed to commit an offense against the laws of the United States, that is international parental kidnapping in violation of 18 U.S.C. § 1204, all in violation of 18 U.S.C. § 371.

OVERT ACTS

In furtherance of the conspiracy and to effect the object, the conspirators committed numerous overt acts in the District of Montana and elsewhere, including, but not limited to, the following:

1. On or about August 17, 2021, near Seattle, Washington, the defendant, CANDACE KATHLEEN BRIGHT, sold the boat that belonged to the defendant, JACOB ISRAEL STRONG, *aka Jacob Israel Guill*, and used the sale proceeds to purchase a vehicle in order to transport Strong's personal property to Texas.
2. On or about September 28, 2021, the defendant, CANDACE KATHLEEN BRIGHT, drove Jacob Strong's Volkswagen Jetta from Texas to

Spokane, Washington and abandoned the vehicle there in order to thwart law enforcement's efforts to locate Jacob and his child.

COUNT 2

That beginning on or about August 19, 2021, and continuing until on or about May 22, 2022, in Sanders County, in the States and District of Montana, and elsewhere, including Costa Rica, the defendant, JACOB ISRAEL STRONG, *aka Jacob Israel Guill*, did remove a child from the United States and retain that child outside of the United States with the intent to obstruct the lawful exercise of another person's parental rights, in violation of 18 U.S.C. § 1204.

COUNT 3

That on or about October 4, 2021, in Flathead County, in the State and District of Montana, and elsewhere, the defendant, CANDACE KATHLEEN BRIGHT, willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by telling an agent from the Federal Bureau of Investigation she had not seen Jacob Strong and her grandchild since approximately August 17, 2021. The statement and representation were false because, as CANDACE KATHLEEN BRIGHT then and there knew, she saw Jacob Strong and her grandchild on approximately August 28, 2021, in Texas. All in violation of 18 U.S.C. § 1001(a)(2).

COUNT 4

That on or about October 4, 2021, in Flathead County, in the State and District of Montana, and elsewhere, the defendant, CANDACE KATHLEEN BRIGHT, willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by telling an agent from the Federal Bureau of Investigation she did not know the location of Jacob Strong and her grandchild. The statement and representation were false because, as CANDACE KATHLEEN BRIGHT then and there knew, Jacob Strong and her grandchild were traveling from Texas to Costa Rica. All in violation of 18 U.S.C. § 1001(a)(2).

COUNT 5

That on or about October 4, 2021, in Flathead County, in the State and District of Montana, and elsewhere, the defendant, CANDACE KATHLEEN BRIGHT, willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by telling an agent from the Federal Bureau of Investigation she did not know Jacob Strong's current phone numbers. The statement and representation were false because CANDACE KATHLEEN BRIGHT knew Jacob Strong's current phone numbers and had

communicated with him on more than 100 occasions between August 21, 2021, and September 29, 2021. All in violation of 18 U.S.C. § 1001(a)(2).

COUNT 6

That on or about December 13, 2021, in Flathead County, in the State and District of Montana, and elsewhere, the defendant, CANDACE KATHLEEN BRIGHT, willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by telling an agent from the Federal Bureau of Investigation she did not know where Jacob Strong and her grandchild were and she had not seen them since a boating accident near Seattle several months earlier. The statement and representation were false because CANDACE KATHLEEN BRIGHT then and there knew Jacob Strong and her grandchild were in Costa Rica. All in violation of 18 U.S.C. § 1001(a)(2).

COUNT 7

That on or about December 13, 2021, in Flathead County, in the State and District of Montana, and elsewhere, the defendant, CANDACE KATHLEEN BRIGHT, willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by telling an agent from the Federal Bureau of Investigation she hitched a ride to Spokane, Washington

with some acquaintances after selling Jacob Strong's boat near Seattle, Washington on or about August 17, 2021. The statement and representation were false because, after selling the boat, CANDACE KATHLEEN BRIGHT drove to Texas in a white Ford Expedition to meet up with Jacob Strong and her grandchild. All in violation of 18 U.S.C. § 1001(a)(2).

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON


LEIF M. JOHNSON
United States Attorney


TIMOTHY J. RACICOT
Criminal Chief Assistant U.S. Attorney